

BOIES SCHILLER FLEXNER LLP
 RICHARD J. POCKER (NV Bar No. 3568)
 300 South Fourth Street, Suite 800
 Las Vegas, NV 89101
 Telephone: 702.382.7300
 Facsimile: 702.382.2755
 rpocker@bsfllp.com

BOIES SCHILLER FLEXNER LLP
 WILLIAM ISAACSON (*pro hac vice*)
 KAREN DUNN (*pro hac vice*)
 1401 New York Avenue, NW, 11th Floor
 Washington, DC 20005
 Telephone: 202.237.2727
 Facsimile: 202.237.6131
 wisaacson@bsfllp.com
 kdunn@bsfllp.com

BOIES SCHILLER FLEXNER LLP
 STEVEN C. HOLTZMAN (*pro hac vice*)
 BEKO O. REBLITZ-RICHARDSON
 (*pro hac vice*)
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Telephone: 415.293.6800
 Facsimile: 415.293.6899
 sholtzman@bsfllp.com
 brichardson@bsfllp.com

MORGAN, LEWIS & BOCKIUS LLP
 BENJAMIN P. SMITH (*pro hac vice*)
 JOHN A. POLITO (*pro hac vice*)
 SHARON R. SMITH (*pro hac vice*)
 One Market, Spear Street Tower
 San Francisco, CA 94105
 Telephone: 415.442.1000
 Facsimile: 415.442.1001
 benjamin.smith@morganlewis.com
 john.polito@morganlewis.com
 sharon.smith@morganlewis.com

DORIAN DALEY (*pro hac vice*)
 DEBORAH K. MILLER (*pro hac vice*)
 JAMES C. MAROULIS (*pro hac vice*)
 ORACLE CORPORATION
 500 Oracle Parkway, M/S 5op7
 Redwood City, CA 94070
 Telephone: 650.506.4846
 Facsimile: 650.506.7114
 dorian.daley@oracle.com
 deborah.miller@oracle.com
 jim.maroulis@oracle.com

*Attorneys for Plaintiffs Oracle USA, Inc.,
 Oracle America, Inc., and Oracle
 International Corp.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
 ORACLE AMERICA, INC., a Delaware
 corporation; and ORACLE INTERNATIONAL
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-VCF

**ORACLE'S MOTION TO SEAL
 PORTIONS OF THE JOINT
 STATEMENT RE PROPOSED
 SCHEDULING ORDER**

1 Pursuant to the Stipulated Protective Order governing confidentiality of documents
2 entered by the Court on May 21, 2010, ECF No. 55 (“Protective Order”), and Rules 5.2 and
3 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc.,
4 and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court
5 order the Clerk of the Court to file under seal certain portions of the Joint Statement Re Proposed
6 Scheduling Order (“Joint Statement”). A public, redacted version was filed on November 19,
7 2019 *See* ECF No. 1284. An unredacted version of the document will be subsequently filed
8 under seal with the Court and linked to the filing of this Motion.

9 Oracle requests that the Court seal portions of the Joint Statement because the document
10 contain information that Rimini has designated as “Confidential Information” or “Highly
11 Confidential Information – Attorneys’ Eyes Only” under the terms of the Protective Order.

12 The Protective Order states, “Counsel for any Designating Party may designate any
13 Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information –
14 Attorneys’ Eyes Only’ under the terms of this Protective Order ***only if such counsel in good***
15 ***faith believes that such Discovery Material contains such information and is subject to***
16 ***protection under Federal Rule of Civil Procedure 26(c).*** The designation by any Designating
17 Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential
18 Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the
19 Designating Party reasonably believes there is a valid basis for such designation.” Protective
20 Order ¶ 2 (emphasis added).

21 Thus, with respect to the portions of Joint Statement containing material that Rimini has
22 designated Confidential or Highly Confidential, these portions should be filed under seal, and
23 Oracle, as the filing party, makes this request. Oracle does not independently contend that these
24 portions are subject to such protection, but makes this request pursuant to ¶ 14 of the Protective
25 Order.

26 For the foregoing reasons, Oracle respectfully requests that the Court grant leave to file
27 under seal portions of the Joint Statement Re Proposed Scheduling Order.
28

1 DATED: November 19, 2019

MORGAN, LEWIS & BOCKIUS LLP

2 By: /s/ Jacob J.O. Minne

3 Jacob J.O. Minne

4 Attorneys for Plaintiffs

5 Oracle USA, Inc., Oracle America, Inc.,
6 and Oracle International Corp.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September 2019, I electronically transmitted the foregoing **ORACLE’S MOTION TO SEAL PORTIONS OF THE JOINT STATEMENT RE PROPOSED SCHEDULING ORDER** to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

Dated: November 19, 2019

Morgan, Lewis & Bockius LLP

By: /s/ Jacob J.O. Minne
Jacob J.O. Minne

Attorneys for Plaintiffs
Oracle USA, Inc., Oracle America, Inc., and
Oracle International Corporation